## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

Richard C. Dye : Case No. 14-10314-TPA

Sandra L. Dye : Chapter 13

Debtors

: Document No.:

JPMorgan Chase Bank, N.A. :

Movant, : Related to Document No. 84

Related to Claim No. 12

v.

Richard C. Dye

Sandra L. Dye
Ronda J. Winnecour, Esq. Trustee

Respondent

## DECLARATION OF COUNSEL FOR DEBTOR AND NOTICE OF MORTGAGE PAYMENT CHANGE

**AND NOW** comes CHESTER B. SCHOLL, JR., counsel for the Debtors, RICHARD C. DYE and SANDRA L. DYE, and hereby declares under penalty of perjury that:

- 1. I have reviewed the existing Chapter 13 Plan of the Debtors, RICHARD C. DYE and SANDRA L. DYE, in connection with the above-captioned proceeding; and
- 2. I have recomputed the plan payment in this matter in accordance with the change in the postpetition monthly mortgage payment with JPMorgan Chase Bank, N.A.; and
- 3. I have determined that the existing plan payment is sufficient to fund the Chapter 13 Plan even with the change in the post-petition monthly mortgage payment to Wells Fargo Bank, N.A.

The new post-petition monthly payment payable to JPMorgan Chase Bank, N.A., is \$1,126.27 effective with the payment due June 1, 2017, as per the Notice dated April 19, 2017.

Respectfully submitted,

/s/ Chester B. Scholl, Jr. CHESTER B. SCHOLL, JR., ESQ. Attorney for Debtor 32 Shenango Ave., P.O. Box 673 Sharon, PA 16146

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Dated: April 28, 2017